

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jonathan Gibson,

Case: 4:23-mj-30067

Assigned To : Ivy, Curtis, Jr

Assign. Date : 2/15/2023

Description: COMP USA v Jonathan Gibson (kcm)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 14, 2023 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

Possession with intent to distribute controlled substance

This criminal complaint is based on these facts:


**Please see affidavit**

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence and/or by  
reliable electronic means.

Date: 2/15/2023

City and state: Flint, MI

  
Complainant's signature

James McKay, Postal Inspector, USPIS

Printed name and title

  
Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

The undersigned, James D. McKay, being first duly sworn, hereby deposes and states as follows:

1. I, Postal Inspector James McKay, am assigned to the United States Postal Inspection Service (USPIS), Detroit Division. I have been employed as a Postal Inspector since January of 2022. I am assigned to investigate the unlawful transportation of contraband, including those covered under the Controlled Substances Act in Title 21 of the United States Code, through the United States Mail. Prior to receiving this position, I was employed as a Special Agent with the United States Secret Service for six and a half years. During that time, I conducted numerous financial crime and counterfeit currency investigations. Additionally, from January of 2008 until June of 2015, I was employed as a police officer, with the last four and a half years assigned as a detective. I investigated various crimes to include narcotic offenses, homicides, criminal sexual conduct, thefts, burglaries, assaults, and financial crimes. In addition to the training mentioned above, I have completed formal training related to fraud, identity theft, and money laundering through the USPIS, other law enforcement agencies, and training organizations. I have been the lead investigator on numerous state and federal investigations. I have also participated in numerous investigations and search warrants involving multiple state and federal charges, to include narcotic offenses, fraud, wire fraud,

money laundering, identity theft, gambling, and homicides led by other federal and local law enforcement officers.

2. My additional training includes working with other experienced United States Postal Agents in the identification and interdiction of mailed parcels containing contraband and assisting them investigate incidents wherein the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances, such as marijuana, cocaine, methamphetamine and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint, it does not set forth every fact that I or others have learned during the course of this investigation.

#### EXECUTIVE SUMMARY

3. This affidavit is submitted in support of an application for a criminal complaint and warrant to arrest Jonathan Neal Gibson, for violations of Title 21, United States Code, Section 841(a)(1), possession with intent to distribute controlled substances.

#### SUMMARY OF INVESTIGATION

4. On February 13, 2023, U.S. Postal Inspectors intercepted a USPS Priority Mail parcel at a postal facility in Michigan. The parcel, was addressed to

“David Miller, 4742 Birchcrest Dr, Flint, MI 48504” with a return address of “Maik Miller, 4107 W Pasadena Ave, PHX Az 85019.” The parcel was mailed on February 8, 2023, from Phoenix, AZ. This parcel is hereafter referred to as the subject parcel.

5. Pursuant to further investigation, including a positive alert by a certified and trained narcotics detection canine, on February 13, 2023, I obtained a federal search warrant. On the same date, I executed the federal search warrant on the subject parcel and discovered that it contained the following: a smaller white USPS box that contained two Swiffer wet mopping cloth containers re-sealed with clear tape that were wrapped in green plastic wrap. Inside each Swiffer wet mopping cloth container were mopping cloths and a clear vacuum sealed bag wrapped with white tape. Inside each vacuum sealed bag was a clear bag wrapped in clear plastic wrap and a wet substance that contained a bundle of TruNarc field tested Methamphetamine. The total weight of the two bundles of suspected Methamphetamine was approximately 930 grams. A controlled delivery of the subject parcel was scheduled for February 14, 2023.

6. On February 14, 2023, at approximately 10:27 a.m., an undercover U.S. Postal Inspector, posing as a U.S. Postal Service Letter Carrier, delivered the subject parcel to 4742 Birchcrest Dr., Flint, MI 48504. The suspected Methamphetamine was replaced with a sham substance fashioned to appear the

same weight as the seized contraband, as well as a small representative sample of the suspected Methamphetamine. The undercover U.S. Postal Inspector was met in the front of the target address upon delivering the subject parcel by an unidentified black male in his late 40's to early 50's. The unidentified male took the subject parcel inside of 4742 Birchcrest Dr., Flint, MI 48504 in clear view of U.S. Postal Inspectors conducting surveillance.

7. On the same date at approximately 2:12 p.m., Jonathan Neal Gibson (Gibson) and Louis Alonzo Brown (Brown) arrived at 4742 Birchcrest Dr., Flint, MI 48504 in a black Chevrolet Malibu and parked in front of the residence.

8. Right after arrival, Gibson and Brown exited the Chevrolet Malibu and entered 4742 Birchcrest Dr., Flint, MI 48504.

9. On the same date at approximately 2:50 p.m., Gibson and Brown exited 4742 Birchcrest Dr., Flint, MI 48504. A U.S. Postal Inspector on surveillance observed that Gibson had something hidden underneath his coat. Gibson and Brown entered the black Chevrolet Malibu and departed north on Birchcrest Dr.

10. As the Chevrolet Malibu drove away from the target address, the U.S. Postal Inspector on surveillance near 4742 Birchcrest Dr. advised the signal from the transmitter wired inside the subject parcel was getting weaker. As the Chevrolet Malibu approached my position near Cloverlawn Dr. and W. Pierson

Rd., Flint, MI, I noticed the signal from the transmitter wired inside the subject parcel became stronger and clearer.

11. The Chevrolet Malibu turned east on W. Pierson Rd. and continued in that direction until N. Saginaw St. Once it turned on W. Pierson Rd. from Cloverlawn Dr., I pulled out and began to follow the Chevrolet Malibu. As I continued to follow the Malibu, I continued to get a strong, clear signal from the transmitter wired inside the subject parcel, giving further indication the subject parcel was located inside the Chevrolet Malibu. Once the Malibu approached N. Saginaw St., it made a right turn southbound and continued until E. Jamieson St., where it was stopped by officers of the Flint Police Department. It was at that time Gibson and Brown were identified.

12. Upon approaching the Chevrolet Malibu, Gibson was the driver and Brown was the front seat passenger. The subject parcel was observed in plain view from both the front driver's side door and front passenger's side door.





13. Gibson was advised of his Miranda Rights and declined to answer any questions.

14. Brown was advised of his Miranda Rights and agreed to questioning. Brown said he is good friends with Gibson. Brown stated he and Gibson were at Gibson's house when Gibson asked him if he wanted to go with him to get a box. Brown agreed to go with Gibson and the plan was for Gibson to drop Brown off at his sister's home after picking up the box. Brown stated he and Gibson drove to "Pops" house at 4742 Birchcrest Dr., Flint, MI 48504, where they both went inside. Brown said "Pops" is Kevin Kelso Sr. (KELSO), who was identified by U.S. Postal Inspectors conducting surveillance of 4742 Birchcrest Dr. Once inside the residence, Brown said he smoked Marijuana and did not notice any interaction between Gibson and Kelso. Some time after arriving, Brown said he and Gibson left with Gibson taking the subject parcel. Brown denied any knowledge of subject

parcel's contents.

15. Based on my training and experience, 930 grams of Methamphetamine would be an amount consistent with distribution and would greatly exceed an amount intended for personal use.

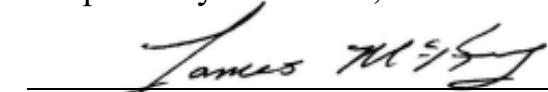
16. Based upon my training and experience and knowledge of wholesale versus retail price of Methamphetamine, the potential street value of the approximately 930 grams seized would be over \$50,000.00, and as such, the attempted possession of the Methamphetamine is indicative of possession with intent to further distribute.

*(Remainder of this page intentionally left blank)*



17. Based upon forgoing, there is probable cause to believe Jonathan Neal Gibson has knowingly violated Title 21, United States Code, Sections 841(a)(1) by possessing with the intent to distribute controlled substances. Accordingly, I respectfully request that this Court issues a complaint and arrest warrant.

Respectfully submitted,

  
James D. McKay, U.S. Postal Inspector  
United States Postal Inspection Service

Sworn to before me and signed in my presence and/or by reliable electronic means on this 15<sup>th</sup> day of February, 2023.



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Curtis Ivy, Jr.  
United States Magistrate Judge